

EXHIBIT 25

THE HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

PLAINTIFF PACITO; PLAINTIFF ESTHER;
PLAINTIFF JOSEPHINE; PLAINTIFF SARA;
PLAINTIFF ALYAS; PLAINTIFF MARCOS;
PLAINTIFF AHMED; PLAINTIFF RACHEL;
PLAINTIFF ALI; HIAS, INC.; CHURCH
WORLD SERVICE, INC.; and LUTHERAN
COMMUNITY SERVICES NORTHWEST,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States; MARCO RUBIO,
in his official capacity as Secretary of State;
KRISTI NOEM, in her official capacity as
Secretary of Homeland Security; DOROTHY A.
FINK, in her official capacity as Acting Secretary
of Health and Human Services,

Defendants.

Case No. C25-255 JNW

DECLARATION OF DAVID DUEA

I, David Duea, hereby declare:

1. I am the Chief Executive Officer of Lutheran Community Services Northwest (“LCSNW”), which I have led since July 1, 2014. The facts set forth in this declaration are based on my personal knowledge, my conversations with my staff, and documents kept in the ordinary course of business at LCSNW.

DECL. OF DAVID DUEA
(No. C25-255 JNW)

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1 2. I make this declaration in support of Plaintiffs' Motion for a Temporary
2 Restraining Order and Preliminary Injunction. LCSNW seeks to enjoin the implementation of
3 Executive Order 14163 ("EO 14163"), which suspends the U.S. Refugee Assistance Program
4 (USRAP) indefinitely, and to reverse the government's sudden suspension of funding for refugee
5 resettlement.

6 3. The government's suspensions are having and will continue to have a devastating
7 impact on refugee clients, funding, and operations that are vital to LCSNW's mission. Refugees
8 we work with directly have had travel plans cancelled, family reunifications suspended, and
9 crucial essential services cut. LCSNW is scrambling to make up the difference so that our
10 clients don't lose services, and we are pulling hard-won resources together to make sure that
11 refugees and the staff who serve them can maintain stability.

12 **I. Lutheran Community Services Northwest**

13 4. LCSNW is a nonprofit, 501(c)(3) organization incorporated in the state of
14 Oregon, with headquarters in Tacoma, Washington. LCSNW is a social service agency that
15 formed in 2001 from the merger of several Lutheran outreach ministries and nonprofit
16 organizations that had served communities in the Northwest since the 1920s. LCSNW's lines of
17 service include refugee and immigrant services, mental health counseling, low-income housing,
18 child and family welfare, and support for victims of crime. LCSNW has more than 40 locations
19 across Washington, Oregon, and Idaho, with more than 700 employees and dozens of programs
20 providing services to more than 40,000 clients per year.

21 5. Refugee resettlement work is a core part of LCSNW's work and has been central
22 to the mission of the organizations that formed LCSNW since at least the 1950s. We estimate
23 that LCSNW and its precursor organizations have served more than 40,000 refugees since 1975.

24 6. As Chief Executive Officer for the last decade, I have had overall responsibility
25 for the day-to-day operations of LCSNW, which is one of the regional and local agencies whose
26 services are funded by subcontracts with one of ten national resettlement agencies.

1 7. I was born in Minnesota and later moved to the Pacific Northwest, where I earned
2 a bachelor's degree in social work from Pacific Lutheran University and an MBA. Since 2014,
3 my team and I have led LCSNW through significant growth, expanding programs in behavioral
4 health, refugee services, child welfare, and housing. Now living in Tacoma, I remain committed
5 to strengthening community partnerships and ensuring LCSNW provides life-changing services
6 across the region.

7 8. Through my past and current work, I have become deeply familiar with the
8 process for resettling refugees in the United States and LCSNW's particular role in that process.

9 9. The resettlement support LCSNW provides to refugees includes welcoming
10 refugees at the airport; securing housing, furnishings, and food; and referring refugees and their
11 families for both temporary and long-term housing, school enrollment, job coaching, and cash
12 assistance.

13 10. The relationships and the goodwill we have built over decades in the communities
14 we serve are essential to the success of our services.

15 11. Federal funding for LCSNW's Refugee Reception and Placement Program (R&P
16 Program) located primarily in Tacoma, WA, and Portland, OR, constitutes 95% of the funding
17 for LCSNW's resettlement assistance programs, including approximately 50 jobs.

18 **II. LCSNW's Participation in the U.S. Refugee Admissions Program**

19 12. LCSNW funds its refugee resettlement work primarily with funding from the
20 federal government, sometimes in partnership with state agencies and other community partners.
21 While our services to refugees date back to the 1950s, since the passage of the Refugee Act in
22 1980, LCSNW has provided initial resettlement services to refugees primarily through funding
23 from federal agencies.

24 13. LCSNW is an affiliate of a national resettlement agency (RA), one of ten that
25 provide the infrastructure for the United States Refugee Admissions Program. Through this
26 affiliate relationship, LCSNW receives funding from the Department of State's Bureau of

1 Population, Migration, and Resettlement (PRM) to provide Resettlement and Placement (R&P)
2 services. This funding is provided through “cooperative agreements” between LCSNW and the
3 RA.

4 14. LCSNW’s 2024-2025 cooperative agreements with the RA provided for up to
5 \$4,377,000 from PRM to support LCSNW’s Reception and Placement (R&P) program, which
6 provides for services and assistance to refugees through their first 90 days in the United States.
7 LCSNW invoices the RA for reimbursement based on the number of refugees we serve.

8 15. This same affiliate process applies to other grants we receive via the RA,
9 including \$1,312,612 in funding from the Office of Refugee Resettlement (ORR) of the U.S.
10 Department of Health and Human Services to support programs and services for refugee clients
11 following their first 90 days in the United States.

12 16. We help resettle hundreds of refugees in our catchment areas each year. In the
13 2024 federal fiscal year, we assisted 1391; in 2023, 1043; in 2022; 676.

14 17. Our refugee resettlement work is a deeply local endeavor that depends on our
15 long-term partnerships in the communities we serve. We work with local landlords to persuade
16 them to provide leases to incoming refugees whom the landlord has never met and who have no
17 employment or credit history. Securing these leases is possible only because of our strong
18 outreach and local relationships.

19 18. We work in similar ways with private employers in local communities,
20 encouraging them to give new refugees, who often speak little or no English, a chance at stable
21 employment. We work with school systems, medical care providers, and local benefit offices to
22 ensure that arriving families are able to have the essential services they need to start new lives
23 with as much security and stability as possible.

24 19. We partner with local governments and community groups to help welcome and
25 integrate refugee clients, allowing clients to build new social connections and social support
26 structures. We consult and coordinate with state and local officials, as well as other public and

1 private organizations, to maximize the impact to refugees the limited public funds made
2 available to them for their first months in our communities. We are intentional in our work to
3 ensure services are most impactful on behalf of our clients.

4 20. Successful resettlement of newly arrived refugee clients relies on trust built up
5 over decades of hard work between LCSNW and our community partners, including state and
6 local governments, businesses, community groups, and private individuals. LCSNW helps ensure
7 that new arrivals will be welcomed in their new homes by providing the support and connections
8 they need to become independent and productive. The local communities, in turn, rely on
9 LCSNW to support new arrivals in good faith. Communities know they can trust LCSNW not to
10 abandon clients to their own devices, and as a result, those communities feel comfortable
11 welcoming these new arrivals, confident that they will not be a burden to their neighbors.

12 **III. Office of Refugee Resettlement Funded Programs**

13 21. LCSNW also receives funding from the Office of Refugee Resettlement (“ORR”)
14 of the Department of Health and Human Services for longer-term refugee resettlement work.

15 22. ORR works through the states and other nongovernmental organizations such as
16 LCSNW to provide longer-term cash and medical assistance, as well as language, employment,
17 and social services. This is a key component in the refugee resettlement process.

18 23. Through our cooperative agreements with the RA, LCSNW provides services to
19 refugees funded by ORR’s Preferred Communities, Safe Release and Family Strengthening
20 programs. The Preferred Communities program includes a service to refugee clients called
21 Matching Grant. Matching Grant is an alternative to public cash benefits, providing support with
22 rent, utilities, transportation, and other basic needs until the family is able to become self-
23 sufficient through employment. Preferred Communities also supports families with case
24 management, job readiness skills, job development, job placement, and follow up services.

25 24. Clients of the Preferred Communities program may arrive with severe medical
26 issues, mental health concerns, or other vulnerabilities that require more intensive support. The

1 Preferred Communities program supports the most vulnerable refugees resettled in the US by
2 providing intensive case management, including intake and assessment of needs and risk factors,
3 a service plan, and regular contact and support to reach goals.

4 25. ORR has committed to \$1,312,912 in funding for LCSNW for the 2024-2025
5 agreement period, via our RA partner.

6 **IV. Executive Order 14163 and Immediate and Ongoing Impact on LCSNW**
7 **and its Clients**

8 26. As described below, refugee admissions and decision-making have been
9 suspended as of January 20, 2025, and all the funds PRM committed to LCSNW to fund this
10 work has been halted as of January 24, 2025. In addition, although LCSNW has received no
11 formal suspension of our ORR funding, the RA has been unable to access funding for work
12 LCSNW has contracted to do or even to obtain reimbursements for work done in November and
13 December of 2024.

14 27. On January 20, 2025, President Trump signed an Executive Order (“EO”)
15 suspending all refugee admissions and decisions effective January 27, 2025. EO 14163, titled
16 “Realigning the United States Refugee Admissions Program,” orders the suspension of all
17 refugee admissions and decisions on refugee applications “until such time as the further entry
18 into the United States of refugees aligns with the interests of the United States interests,” that is
19 to say, indefinitely.

20 28. On January 22, 2025, LCSNW received an email from the RA stating that PRM
21 had informed the RA that “all refugee travel would be cancelled until further notice” and that no
22 refugee travel would be booked. The email stated that these cancellations were taking place
23 immediately, “earlier than what we expected” given that EO 14163 stated that it would not take
24 effect until January 27, 2025.

25 29. EO 14163 has caused immediate harm to LCSNW’s mission, to the refugees we
26 serve, and to economic stability. That harm increases every day that EO 14163 is in effect.

30. EO 14163 does immense damage to LCSNW's organizational mission to assist and welcome refugees to enter the United States through the statutory pathways authorized by the United States Congress and to resettle here with safety and stability. The EO indefinitely stops the entry of refugees we have committed to serving, bars family members from reunifying with their loved ones inside the United States and has stopped decision-making for refugees who have gone through extensive vetting and have waited for months and in some cases years to enter the United States.

31. Because the suspension is indefinite, we are unable to predict when or if the services we provide to incoming refugees will resume. As described below, we receive federal government funding based on the number of refugees we serve. It will be exceedingly difficult to maintain relationships with sponsors of refugees and our extensive local networks while the programs are indefinitely suspended. The quality of the services we can provide will suffer. Our mission to serve refugees will be irreparably damaged.

32. Without incoming refugees, LCSNW will not be able to sustain its refugee resettlement programs that have been a core part of our mission for decades. The contraction of our work could lead to layoffs and will certainly lead to loss of relationships and essential networks that provide a vital supplement to federal funding, allowing us to welcome refugees in our communities.

V. EO 14169 and the U.S. State Department's January 24, 2025 Order to "Stop Work"

33. In addition to EO 14163, on January 20, President Trump signed 44 other executive orders. Among these was EO 14169, "Reevaluating and Realigning Foreign Aid," which suspended all foreign aid programs, including those serving refugees, for ninety days.

34. On January 24, the RA received a Notice of Suspension of PRM-funded work, including grants that flowed to LCSNW. On January 30, 2025, LCSNW received an email instructing us not to file claims and expenses for any work performed after January 24, 2025, and that the RA would use its own resources to provide funding for "client emergency and basic

needs expenses” for recently-arrived refugees who had arrived between December 24, 2025 and January 24, 2025.

VI. The Devastating Impact of EO 14163 and the Suspension of Funding on Refugees.

35. The refugees we work with in the United States and overseas have had their plans upended overnight. As of February 7, 2025, LCSNW has 610 clients overseas who have been extensively vetted and are awaiting resettlement to the United States.

36. All of these individuals have had their life plans upended, their separation from family members prolonged, and their chances for stability and safety suspended indefinitely.

37. The financial impact on recently resettled refugees is likewise severe.

38. LCSNW obtains approval at the start of each fiscal year for a certain number of refugees that it has capacity to serve year. PRM’s Reception and Placement (R&P) Program, through the RA, provides LCSNW with \$3,000 per refugee whom LCSNW has assured. These funds assist with meeting expenses during a refugee’s first few months in the United States.

39. At least \$1,650 of that grant must be used to cover payments directly to or on behalf of the refugee. The remaining \$1,350 may be used towards the expenses of the local office that provides R&P services to assist with meeting expenses during a refugee’s first few months in the United States. But this amount does not cover the true cost of our services.

40. During the R&P period, case managers provide refugee families with a variety of core services, including, but not limited to, airport reception with qualified interpretation, safety orientation, cultural orientation, enrollment in English classes for adults and school for children, access to eligible public benefits, including SNAP, WIC, and other public services, enrollment in employment services, emotional and social well-being services, health care and vaccinations, and a firm connection to ongoing services available at the organization and in the community.

41. As of February 7, 2025, LCSNW has approximately 268 recently arrived refugees and SIV holders who are in the first 90 days of resettlement in the United States. PRM funding

1 for essential services to those recently resettled individuals has been frozen as of January 24,
2 2025.

3 **VII. Consequences of EO 14163 and the Notice of Suspension for LCSNW's Operations**

4 42. The total amount immediately impacted by the Notice of Suspension is more than
5 \$4,377,000.

6 43. In addition, although we understand that the RA has not received a formal notice
7 of suspension of funding from ORR, it has not been able to access funding for ORR programs.
8 The total amount of ORR funding that LCSNW would receive from the RA under 2024-2025
9 contracts is \$1,312,612.

10 44. Approximately 50 staff are employed by LCSNW's R&P programs, and all of
11 those jobs are in jeopardy. LCSNW has continued to provide services without a guarantee of
12 funding out of a strong commitment to assist our clients, and we are working on reallocating
13 available funding to cover the immediate shortfall.

14 **VIII. Conclusion**

15 45. Without immediate relief, LCSNW's clients both in the United States and
16 overseas will suffer immense harm that will be impossible to repair. Should the suspension of
17 refugee entry and funding continue, our refugee resettlement programs will be severely curtailed,
18 and we run the very real risk of layoffs. Losing the experienced staff and the long-term
19 relationships they have built in our communities will be irreparable; it will not be easy to rebuild
20 these programs if they shrink or are shut down.

21
22 I declare under penalty of perjury under the laws of the United States that the foregoing is
23 true and correct.

24 EXECUTED this 11th day of February, 2025, at Tacoma, Washington.

25 
26 David Duea